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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

NORA QUICHO,	}	Case No.: 2:23-cv-02785-WBS-CKD
Plaintiff,		STIPULATION AND ORDER FOR AN
vs.		EXTENSION OF TIME
COMMISSIONER OF SOCIAL SECURITY,		
Defendant.		

Pending the Court's approval, the parties hereby stipulate that the time for Defendant to respond to Plaintiff's Motion for Summary Judgment be extended thirty (30) days from July 3, 2024, up to and including August 2, 2024.

This is Defendant's first request for an extension, and it is made with good cause. Defendant's counsel requires additional time to evaluate the merits of the case and consult with her client, as necessary. Counsel also has three briefs due in the next 10 days, with other litigation matters pending. Therefore, Defendant requests this extension in good faith and with no intent to delay these proceedings unnecessarily.

1 The parties further stipulate that the Court's Scheduling Order shall be modified
2 accordingly.

3 Respectfully submitted,

4 Dated: June 26, 2024

/s/ Harvey Peter Sackett*
(*as authorized via e-mail on June 26, 2024)
HARVEY PETER SACKETT
Attorney for Plaintiff

7 Dated: June 26, 2024

8 PHILLIP A. TALBERT
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9 MATHEW W. PILE
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12 By: /s/ Mary Tsai
MARY TSAI
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15 Attorneys for Defendant

16 **ORDER**

17 Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an
18 extension, up to and including August 2, 2024, to respond to Plaintiff's Motion for Summary
19 Judgment.

21 Dated: June 26, 2024


CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE